#### John R. Kaiser

# Schedule A

Any and all books, papers, documents and data in either paper or electronic form inclusive of files maintained on computer hard drives and/or other electronic storage devices and communications in any form inclusive of email communications concerning the following matters collectively referred to as "all documents" for the purpose of this subpoena:

All documents related to the distribution of funds from the sale of the Sag Harbor property.

All documents comprising of the corporate records of North Point Properties LLC including but not limited to the articles of organization, operating agreement, filing receipt and membership certificates, if any, reflecting ownership interest in the LLC.

All documents comprising communications between you and others concerning the establishment, operation, financing, and business purpose of North Point Properties LLC as well as the ownership interest in real property in the name of the LLC from 2004 to present.

All documents comprising communications between you, Vincent Tesorio, Chris Manfredi and/or Tommy Milana concerning the real property located at 18 North Haven Way, Sag Harbor NY 11963 from 2004 to present.

All documents comprising communications between you and Phil Kenner concerning the real property located at 18 North Haven Way, Sag Harbor NY 11963 from 2004 to present.

All documents related to the source of funds for the contributions to the purchase or repurchase of property in Sag Harbor since 2004.

All documents comprising monetary transfers including but not limited to wire transfers to and from various bank accounts concerning the purchase of the real property located at 18 North Haven Way, Sag Harbor NY 11963 from 2004 to present and/ or your ownership interest in Ledbetter Development Corp. LLC.

All documents evidencing buildings located and/or construction plans at 18 North Haven Way, Sag Harbor NY 11963.

All documents supporting the creation of any Operating Agreement for North Point Properties including but not limited to all correspondences between the parties involved.

All documents comprising communications between you and Phil Kenner concerning the real property located at 18 North Haven Way, Sag Harbor NY 11963 from 2004 to present.

All documents comprising of the corporate records of Ledbetter Development Corp. LLC including but not limited to the articles of organization, operating agreement, filing receipt and membership certificates, if any, reflecting ownership interest in the LLC.

All documents comprising communications between you and others concerning the establishment, operation, financing, and business purpose of Ledbetter Development Corp. LLC as well as the ownership interest in real property in the name of the LLC from 2004 to present.

All real estate closing documents from 2005 to present concerning the real property located at 18 North Haven Way, Sag Harbor NY 11963.

All documents concerning the communications between you and any public taxing authority concerning the property located at 18 North Haven Way, Sag Harbor NY 11963 from 2004 to present.

All documents concerning the transfer of \$380,000 in 2006 from you to Ula Makika at Northern Trust Bank.

All documents related to the distribution of funds from the sale of the Sag Harbor property thru Ledbetter.

All documents evidencing travel receipts from trips taken by you and/or Kenner related to the real estate project at 18 North Haven Way, Sag Harbor NY 11963.

All documents evidencing development plans for the property at 18 North Haven Way, Sag Harbor NY 11963.

All correspondences with Kenner and/or any real estate agents related to the purchase or sale of the property located at 18 North Haven Way, Sag Harbor NY 11963.

All closing documents related to the property at 18 North Haven Way, Sag Harbor NY 11963.

All correspondences with any person related to the purchase or sale or real property at 18 North Haven Way, Sag Harbor NY 11963.

All documents supporting the creation of any Operating Agreement for Ledbetter Development Corp. including but not limited to all correspondences between the parties involved.

All documents related to the transfer of real property and documents evidencing your rights to do so (including but not limited to operating agreements and Trust Agreements) since 2006.

All documents comprising monetary transfers from Na'alehu Ventures 2006, LLC, including wire transfers from bank accounts controlled by Na'alehu Ventures 2006, LLC in an amount of \$7,500 or greater from 2006 to present.

All documents reflecting equity transfers or management transfers between you and Kenner from 2005 to present.

All documents, email and text correspondences and supporting documentation between you, Kenner and or Bryan Berard (John Doe 1) related to meetings with, potential legal action versus and/or resulting decisions related to the Hawaii Joint Venture with Alan Worden, the loan from Lehman Brothers and Trimont Real Estate Advisors, Inc.

All documents related to any communications between you and any member or potential member/ partner in the Hawaii real estate project on the Big Island of Hawaii.

All documents related to taxes and any books and accounting records created by you or commissioned by you for the members of the Hawaii real estate project on the Big Island of Hawaii.

All documents related to agreements signed by you in relation to the Hawaii real estate project on the Big Island of Hawaii.

All documents related to joint venture agreements with the Hawaii real estate project on the Big Island of Hawaii.

All documents representing funds transferred by you or related parties to you to any entity involved in the Hawaii land development deals including but not limited to the documents supporting the source of those funds.

All documents, emails, text messages and/or correspondences representing communications by you as a member of any Hawaii investment entity and/or as the Managing Member of the Hawaii Partners through Na'alehu Management ( the managing member of the Hawaii Partners after August 2006) to Alan Worden or any affiliate of Worden related to the Hawaii land development deal.

All documents and supporting documents and/or agreements reflecting equity transfers or management transfers between you and Kenner from 2005 to present.

All documents related to the transfer of real property by Kaiser (including but not limited to operating agreements and Trust Agreements) since 2006 with Kenner involvement or alleged involvement.

All documents representing funds paid and/or expenses paid by Kaiser on Kenner's behalf or as loans to Kenner on behalf of any project involving Kenner and Kaiser from 2006 to present.

All documents related to funds transferred by you or on your behalf and the corresponding agreements for loans or investments in Eufora.

All documents related to funds borrowed by you for investments in Eufora.

All documents related to correspondences between you and any member (or Kenner) of Eufora related to your investments in Eufora.

All documents related to testimony or affidavits signed by you related to anyone's investment in Eufora including your own.

All documents related to Eufora and correspondences between you and any other investor or person interested in investing in Eufora and documents supporting the actual funds invested.

All documents related to funds deposited into the Global Settlement Fund by you or on your behalf and the source of those funds.

### Kenneth Aboud Jowdy

### Schedule A

Any and all books, papers, documents and data in either paper or electronic form inclusive of files maintained on computer hard drives and/or other electronic storage devices and communications in any form inclusive of email communications concerning the following matters collectively referred to as "all documents" for the purpose of this subpoena:

#### Little Isle IV, LLC:

All documents, correspondences and supporting documents between you, Kenner and/or Mexican attorney Fernando Garcia related to the June 2, 2005 letter from Kenner as the CEO of Little Isle IV, LLC to Mr. Atilio Colli Villarino and the involved transfer of \$700,000 to Ken Jowdy and Fernando Garcia's Mexican company, Propiedades DDM S de RL de CV.; specifically including a legible version with Kenner's signature.

All documents related to and including the "<u>executed</u>" Private Promissory Contract(s) between Kenner (acting as the CEO of Little Isle IV, LLC) and Propiedades DDM S de RL de CV., as referred to in the June 2, 2005 letter from Kenner to Mr. Atilio Colli Villarino; specifically including a legible version with Kenner's signature.

#### Ula Makika, LLC:

All documents, correspondences and supporting documents between you, Kenner and/or Mexican attorney Fernando Garcia related to the June 2, 2005 letter from Kenner as the CEO of Ula Makika, LLC to Mr. Atilio Colli Villarino and the involved transfer of \$550,000 to Ken Jowdy and Fernando Garcia's Mexican company, Propiedades DDM S de RL de CV.; specifically including a legible version with Kenner's signature.

All documents related to and including the "<u>executed</u>" Private Promissory Contract(s) between Kenner (acting as the CEO of Ula Makika, LLC) and Propiedades DDM S de RL de CV., as referred to in the June 2, 2005 letter from Kenner to Mr. Atilio Colli Villarino; specifically including a legible version with Kenner's signature.

#### Bryan Berard schedule A

Any and all books, papers, documents and data in either paper or electronic form inclusive of files maintained on computer hard drives and/or other electronic storage devices and communications in any form inclusive of email communications concerning the following matters collectively referred to as "all documents" for the purpose of this subpoena:

All email and text correspondences and supporting documentation between you, Kenner and or John Kaiser(John Doe 14) related to meetings with, potential legal action versus and/or resulting decisions related to the Hawaii Joint Venture with Alan Worden, the loan from Lehman Brothers and Trimont Real Estate Advisors, Inc.

All documents related to joint venture agreements with the Hawaii real estate project on the Big Island of Hawaii.

All documents related to the distribution of funds from the sale of the Sag Harbor property.

All correspondences including but not limited to emails between you and Kenner regarding the Global Settlement Fund.

# Ethel Kaiser schedule A

Any and all books, papers, documents and data in either paper or electronic form inclusive of files maintained on computer hard drives and/or other electronic storage devices and communications in any form inclusive of email communications concerning the following matters collectively referred to as "all documents" for the purpose of this subpoena:

All documents or correspondences between you and Kenner.

All documents evidencing transfers made by you, the source of those transfers and the documents to confirm participation in the associated investments to Kenner.

#### Northern Trust Bank

# schedule A

Any and all books, papers, documents and data in either paper or electronic form inclusive of files maintained on computer hard drives and/or other electronic storage devices and communications in any form inclusive of email communications concerning the following matters collectively referred to as "all documents" for the purpose of this subpoena:

All documents for the following "account holders" related to the subsequent list below of requested documents:

- Michael Peca
- Owen Nolan
- Joe Juneau
- Mattias Norstrom
- Sergei Gonchar
- Bryan Berard
- Darryl Sydor
- Glen Murray
- Steve Rucchin
- William Ranford

All documents (including emails and/or mailed letters) between any employee of Northern Trust Bank or acting on behalf of Northern Trust Bank and the list of individuals above, concerning their individually guaranteed Line of Credit.

All documents signed by the above clients including but not limited to their Investment management account and their Line(s) of Credit ("LOC") accounts for the following (2002 to present), relative the Line of Credit which Kenner was specifically granted authorization to access for Little Isle IV, LLC:

- 1. Transaction Reports 2002 to present
- 2. LOC Applications 2002 to present
- 3. Authorization "Use of funds" letters-2002 to present
- 4. Monthly Line of Credit loan statements 2002 to present
- 5. Annual Line of Credit loan statements 2002 to present
- 6. Investment management account agreements 2002 to present
- 7. Securities Account control agreement 2002 to present

- 8. Master Notes 2002 to present
- 9. Promissory Notes 2002 to present
- 10. Disbursement Request & Authorization 2002 to present
- 1.1. Notice of Exclusive Control letters 2002 to present
- 12. "Event of Default" letters 2002 to present
- 13. "Notice of Default and Intent to Sell Collateral" letters 2002 to present
- 14. "Special Instructions" naming Standard Advisors (Kenner) designee
- 15. Trading Authorization Forms 2002 to present
- 16. USA Patriot Act Client ID Forms 2002 to present
- 17. Personal Financial Statements 2002 to present
- 18. Credit Applications 2002 to present
- 19. Investment Management Account Application 2002 to present
- 20. Investor Profiles 2002 to present
- 21. Automatic Investment Plans 2002 to present
- 22. Pledge Agreement 2002 to present
- 23. Change in Terms Agreement 2002 to present

#### Charles Schwab Institutional

### Schedule A

Any and all books, papers, documents and data in either paper or electronic form inclusive of files maintained on computer hard drives and/or other electronic storage devices and communications in any form inclusive of email communications concerning the following matters collectively referred to as "all documents" for the purpose of this subpoena:

All documents signed by the named individuals as part of account setup, account termination, fund transfers or other requested transactions that require sign off of the named individual account holder for the following individuals (or accounts the following individuals are a signatory for) including but not limited to all various account types (trusts, individual, retirement, etc.) for the individuals whether or not the account number is listed below from 2002 to present.

- Michael Peca
- Owen Nolan
- Joe Juneau
- Mattias Norstrom Account #7070 5833
- Sergei Gonchar Account #1084 4264
- Bryan Berard Account #7045 3100 & 9052 6059 & 4082 4078
- William Ranford